

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DEANDRE CRAWFORD,

Plaintiff,

v.

LIDIA DIAZ, et al.,

Defendants.

Case Number 18-cv-4882

Judge Mary M. Rowland

**UNOPPOSED MOTION FOR MODIFICATION OF EXPERT DISCOVERY AND
DISPOSITIVE MOTION DEADLINES**

NOW COME the Defendants, LIDIA DIAZ, EVARISTO AGUINALDO, M.D., and GHALIAH OBAISI, as Independent Executor of the Estate of SALEH OBAISI, M.D., Deceased, by and through their attorneys of CASSIDAY SCHADE LLP, and hereby request that the Court enter a modified expert discovery and dispositive motion schedule. In support thereof, Defendants state as follows:

1. Plaintiff proceeds pursuant to 42 U.S.C. § 1983 on deliberate indifference claims against multiple Illinois Department of Corrections (“IDOC”) and Wexford Health Sources, Inc. (“Wexford”) defendants. In his operative pleading, the Plaintiff alleges that he was subjected to unconstitutional conditions of confinement and was offered constitutionally inadequate medical care in response to his injuries that he reportedly suffered. [ECF No. 1].

2. On February 2, 2021, this Court entered a discovery schedule that consisted of deadlines for both fact discovery and expert discovery. [ECF No. 111].

3. On March 24, 2021, a status hearing was held¹ and this Court extended fact discovery until April 30, 2021. In addition, the Court left the expert discovery deadlines in place that it previously entered on February 2, 2021. [ECF No. 112].

4. While fact discovery closed on April 30, 2021, two remaining fact depositions remain due to scheduling complications – Randy Pfister and a Rule 30(b)(6) of IDOC on particular topics. These depositions will proceed with the consent of the parties and should be completed within the next few weeks.

5. Plaintiff timely furnished his expert disclosures on April 20, 2021. Defendants are currently working with Plaintiff on setting a deposition date for his expert within the next few weeks.

6. At this time, due to the remaining discovery required, the Defendants respectfully request that the expert discovery and dispositive motion deadlines be extended for 30 days. As such, the Parties propose the following, modified deadlines:

- i. Plaintiff's expert to be deposed by June 18, 2021;
- ii. Defendants' experts to be disclosed by July 1, 2021;
- iii. Defendants' experts to be deposed by July 29, 2021;
- iv. Plaintiff's rebuttal expert disclosures due August 13, 2021;
- v. Expert discovery to close and deadline for completing expert depositions by August 27, 2021;
- vi. Dispositive motion to be filed by September 27, 2021;
- vii. Response to dispositive motion due October 27, 2021; and
- viii. Reply in support of dispositive motion due November 11, 2021.

¹ Defendants were not present at the status conference, and apologize to the Court for their absence due to a miscalendaring error.

7. The Parties have conferred, and Plaintiff has no objection to the modification of deadlines.

8. This request for modification of deadlines is made in good faith and not for the purpose of undue delay.

WHEREFORE, Defendants, LIDIA DIAZ, EVARISTO AGUINALDO, M.D., and GHALIAH OBAISI, as Independent Executor of the Estate of SALEH OBAISI, M.D., respectfully request the Court enter the above modified expert discovery and dispositive motion schedule, and for any other relief the Court deems fair and just.

Respectfully submitted,

CASSIDAY SCHADE LLP

By: /s/ Brett R. Furmanski

One of the Attorneys for Defendants,
LIDIA DIAZ, and EVARISTO AGUINALDO,
M.D., GHALIAH OBAISI, as Independent
Executor of the Estate of SALEH OBAISI,
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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2021, I electronically filed the foregoing document with the clerk of the court for Northern District of Illinois, Eastern Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

/s/ Brett R. Furmanski

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